

1 Phillip A. Silvestri, Esq.
2 Nevada Bar No. 11276
3 phillip.silvestri@gmlaw.com
4 **GREENSPOON MARDER LLP**
5 3993 Howard Hughes Pkwy., Ste. 400
6 Las Vegas, Nevada 89169
7 Tel: (702) 978-4249
8 Fax: (954) 333-4256

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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

**FEDERAL TRADE COMMISSION, and
STATE OF NEVADA,**

CASE NO.: 2:25-cv-760-CDS-NJK

Plaintiff,

v.

**UNOPPOSED MOTION TO EXTEND
TIME FOR DEFENDANTS TO FILE A
RESPONSE AND/OR ANSWER TO
PLAINTIFFS' COMPLAINT**

**INTERNATIONAL MARKETS LIVE,
INC., et al.**

[First Request]

Defendants.

_____ /

Defendants Global Dynasty Network, LLC. (“Global Dynasty”) and Matthew Rosa (“Rosa” and together with Global Dynasty, “Defendants”), by through counsel, hereby move for an extension of time of thirty-four (34) days to file and serve a response and or answer to the Plaintiff’s Complaint (ECF No. 1), which is currently due on May 27, 2025, through and including July 7, 2025. The undersigned counsel for Defendants also represents Defendant Jason Brown (“Brown”), whose response date is also July 7, 2025, such that the granting of this motion will result in all three Defendants have the same deadline by which to answer or respond to the Complaint.

Fed. R. Civ. P. 6(b) provides that the Court, for good cause, may extend the time to answer or otherwise respond to the Complaint. *See also United States v. Alpine Sec. Corp.*, No. 2:22-CV-01279-RFB-VCF, 2023 WL 8653135, at *1 (D. Nev. Dec. 14, 2023). Here, Defendants’ motion is timely, and is made before the time in which they have to answer the Complaint has expired. Defendants make the motion in anticipation that all Defendants represented by the undersigned might consolidate their responses to the Complaint, thus servicing efficiency purposes for the case. This motion is made in good faith and not for purposes of improper delay. On May 23, 2025, counsel for Defendants conferred with counsel for Plaintiffs. Counsel for Plaintiffs stated they did not oppose the relief requested herein.

Dated: May 27, 2025.

Respectfully submitted,

GREENSPOON MARDER LLP

/s/Phillip Silvestri

PHILLIP SILVESTRI

Nv. Bar No. 11276

Email: philip.silvestri@gmlaw.com

GREENSPOON MARDER LLP

3993 Howard Hughes Parkway, Suite 400

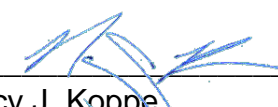
Las Vegas, NV 89159

Tel: (702) 978-4249

IT IS SO ORDERED.

Dated: May 28, 2025

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Nancy J. Koppe

United States Magistrate Judge

*Attorneys for Defendants Jason
Brown, Matt Rosa, and Global Dynasty
Network, LLC*